

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
No. 5:13-CV-00534-F

CATHERINE FOLEY,)	
)	
Plaintiff,)	
)	
v.)	CONSENT MOTION FOR
)	EXTENSION OF TIME FOR
)	DEFENDANTS REPUBLIC
REPUBLIC AIRLINE, INC.,)	AIRLINE, INC. AND FRONTIER
MIDWEST AIRLINES INC.,)	AIRLINES, INC. TO RESPOND
MIDWEST EXPRESS AIRLINES INC.,)	TO COMPLAINT
and FRONTIER AIRLINES, INC.,)	
)	
Defendants.)	

Pursuant to Rule 6 of the Federal Rules of Civil Procedure and Local Civil Rule 6.1, defendants Republic Airline, Inc. (“Republic”) and Frontier Airlines, Inc. (“Frontier”) hereby move the Court, with the consent of plaintiff Catherine Foley (“Plaintiff”), for the entry of an order extending the time for Republic and Frontier to answer or otherwise respond to the complaint herein through and including August 19, 2013.

In support thereof, Republic and Frontier state as follows:

1. Republic and Frontier removed this diversity action to this Court from Wake County Superior Court on July 26, 2013 [DE 1].

2. Republic and Frontier require additional time in which to analyze and to investigate the matters alleged in the complaint and to formulate their response thereto. Accordingly, Republic and Frontier respectfully request an extension of time through and including August 19, 2013, in which to answer or otherwise respond to the complaint.

3. Counsel for Plaintiff has consented to the extension of time requested.

4. Good cause exists for the extension of time requested. This motion is submitted in good faith and not for the purpose of delay.

5. A proposed order granting the extension of time requested herein is submitted herewith as Exhibit 1.

WHEREFORE, Republic and Frontier respectfully request that the time for them to answer or otherwise respond to the complaint be extended through and including August 19, 2013.

This the 5th day of August, 2013.

/s/ Robert J. Morris

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CERTIFICATE OF SERVICE

I hereby certify that on August 5, 2013, I electronically filed the foregoing Consent Motion for Extension of Time for Defendants Republic Airline, Inc. and Frontier Airlines, Inc. to Respond to Complaint with the Clerk of Court using the CM/ECF System, which will send notification to the attorneys of record for Catherine Foley as follows:

Jeanne H. Washburn

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/s/ Robert J. Morris

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